

## EXHIBIT C

**MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEES**

In re: Terrorist Attacks on September 11, 2001 (S.D.N.Y.)

<b>Plaintiffs' Executive Committee for Personal Injury and Death Claims</b>	<b>Plaintiffs' Executive Committee for Commercial Claims</b>
Ronald L. Motley (1944-2013) Jodi Westbrook Flowers / Donald A. Migliori, <i>Co-Chairs</i> MOTLEY RICE LLC James P. Kreindler, <i>Co-Chair</i> KREINDLER & KREINDLER LLP	Stephen A. Cozen, <i>Co-Chair</i> Sean Carter, <i>Co-Chair</i> COZEN O'CONNOR
Andrew J. Maloney III, <i>Co-Liaison Counsel</i> KREINDLER & KREINDLER LLP Robert T. Haeefe, <i>Co-Liaison Counsel</i> MOTLEY RICE LLC	J. Scott Tarbutton, <i>Liaison Counsel</i> COZEN O'CONNOR

VIA ELECTRONIC MAIL

October 23, 2018

Michael K. Kellogg, Esq.  
Kellogg, Hansen, Todd, Figel & Frederick PLLC  
1615 M Street N.W., Suite 400  
Washington, DC 20036

Re: *In Re: Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (SN)

Dear Michael:

In advance of our scheduled meet and confer, the Plaintiffs' Executive Committees offer this written notice to the Kingdom of Saudi Arabia ("Saudi Arabia") that Plaintiffs object to Saudi Arabia's confidentiality designations as to the documents listed on Exhibit A, attached hereto, and request that the Kingdom withdraw its designations as to the identified documents and/or consent to the filing of those documents in the public court docket. We anticipate discussing the designation of these documents during our meet and confer.

This list includes discovery documents that we anticipate filing with various motions, including with our letter on supplemental document discovery and the motion to compel. To be clear, the attached list identifies only a portion of the 3,320 pages that Saudi Arabia has designated as confidential. We anticipate adding more documents to this request as we proceed with our review of the documents Saudi Arabia has produced, and reserve the right to object to other documents that Saudi Arabia has so designated.

Plaintiffs object to the designations listed on Exhibit A because Saudi Arabia has made no showing that these designations meet the standards articulated in Rule 26 of the Federal Rules of Civil Procedure or any applicable case law warranting the confidentiality designation the Court authorized in the Umbrella Order, or that would support the denial of access to any such documents filed in support of submissions to the Court. Moreover, after translation and individual analysis of each of the identified documents, the Plaintiffs remain unable to identify any reason to warrant the designation, much less any rationale that would support a requirement

Michael K. Kellogg, Esq.  
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that any such documents be filed under seal in relation to disputes brought to the Court for resolution.

Sincerely,

COZEN O'CONNOR

MOTLEY RICE LLC

By: /s/ Sean P. Carter  
SEAN P. CARTER  
For the Plaintiffs' Exec. Committees

By: /s/ Robert T. Haeefe  
ROBERT T. HAEFELE  
For the Plaintiffs' Exec. Committees

KREINDLER & KREINDLER LLP

By: /s/ James P. Kreindler  
JAMES P. KREINDLER  
For the Plaintiffs' Exec. Committees

cc: Members of Plaintiffs' Executive Committees (via Email)  
Mark C. Hansen, Esq. (via Email)  
Gregory G. Rapawy, Esq. (via Email)  
Andrew C. Shen, Esq. (via Email)

Michael K. Kellogg, Esq.  
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**Exhibit A**

KSA000550-614	KSA001298-1299	KSA004294
KSA000696	KSA001301	KSA004642-4754
KSA000724-726	KSA001302	KSA005872-5892
KSA000734-737	KSA001305-1313	KSA005998-5999
KSA000740	KSA001318-1325	KSA006459-6464
KSA000792	KSA001329	KSA006641-6643
KSA000840	KSA001333	KSA006666-6668
KSA000852	KSA001334	KSA006670-6673
KSA000854	KSA001342	KSA006812
KSA000856	KSA001345-1346	KSA006860-6864
KSA000883	KSA001348-1349	
KSA000897	KSA001613-1616	
KSA000898	KSA001618-1619	
KSA000903	KSA001623	
KSA000905-906	KSA001625	
KSA000976	KSA001630-1632	
KSA000995	KSA001710-1713	
KSA001168-1173	KSA001716	
KSA001193	KSA001774-1777	
KSA001197	KSA001822-1823	
KSA001194-1201	KSA001825-1832	
KSA001204-1206	KSA001834-1841	
KSA001207	KSA002333-2358	
KSA001210-1212	KSA002584-2594	
KSA001213	KSA002605-2613	
KSA001214-1218	KSA002614	
KSA001219	KSA002627-2630	
KSA001220-1227	KSA002660-2666	
KSA001228	KSA002669	
KSA001229-1240	KSA002670-2671	
KSA001241	KSA002676	
KSA001243-1252	KSA002677-2693	
KSA001253	KSA002678	
KSA001254	KSA002686	
KSA001255	KSA002691-2692	
KSA001256-1273	KSA002693	
KSA001274-1275	KSA002829-2844	
KSA001276	KSA002845-2846	
KSA001277	KSA002847-2850	
KSA001278-1286	KSA002851	
KSA001287-1288	KSA002852-2855	
KSA001289-1294	KSA002862-2869	